

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS
IGOIN, LAURENCE APFELBAUM,
individually and in her capacities as executor
and beneficiary of the Estate (Succession) of
Doris Igoi, and EMILIE APFELBAUM,

Defendants.

Adv. Pro. No. 10-04336 (SMB)

STIPULATION EXTENDING TIME TO RESPOND

WHEREAS, pursuant to a So Ordered stipulation dated May 7, 2014, the parties
each submitted a supplemental brief on the issue of personal jurisdiction in light of new facts and
information learned through jurisdictional discovery on June 20, 2014;

WHEREAS, pursuant to the So Ordered stipulation, the deadline for the parties to submit a reply brief responding to the other party's supplemental brief is July 16, 2014;

WHEREAS, the parties have agreed, subject to the Court's approval, to a two-day extension for submitting their reply briefs in order for counsel for Defendants to coordinate with their overseas clients;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, as follows:

1. The remainder of briefing and argument on the issue of personal jurisdiction shall proceed as follows:
 - a. The parties shall each submit a reply brief responding to the other party's supplemental brief no later than **July 18, 2014;**
 - b. The date for oral argument on the Motion to Dismiss will remain the same, as originally stipulated and agreed, **July 30, 2014 at 10:00 a.m.**
2. This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this stipulation shall be deemed an original.

Dated: New York, New York
July 15, 2014

BAKER & HOSTETLER LLP

By: /s/ Ona T. Wang
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Tracy Cole
Email: tcole@bakerlaw.com
Ona T. Wang
Email: owang@bakerlaw.com
M. Elizabeth Howe
Email: bhowe@bakerlaw.com
David McMillan
Email: dmcmillan@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC*

SO ORDERED:

Dated: July 15th, 2014
New York, New York

KELLEY DRYE & WARREN LLP

By: /s/ Jonathan K. Cooperman
101 Park Avenue
New York, NY 10178
Telephone: 212.808.7534
Facsimile: 212.808.7897
Jonathan K. Cooperman
Email: jcooperman@kelleydrye.com
Jessica L. Klarfeld
Email: jklarfeld@kelleydrye.com

*Attorneys for Defendants Laurence
Apfelbaum, Emilie Apfelbaum, and the Estate
(Succession) of Doris Igoi*

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE